

United States District Court
Wisconsin Eastern District at Milwaukee Division

Pablito Vega, Petitioner

CASE: 23-CV-1357

Vs.

Community Development Financial Institution
Milwaukee Economic Development Corporation
Respondent I

&

Community Development Financial Institution
Local Initiative Support Corporation Milwaukee Office
Respondent II



Motion for RE-Consideration For Default Judgment

Before the Court is a Motion for RE-Consideration For Default Judgment on behalf of Pablito Vega against Respondent LISC for failure to comply with filing an Answer to the \$ 1691 Complaint within 60 days of service dated 20 October 2023 in the matter 23 CV 1357.

For the edification of the Court the \$ 1691 Complaint was signed on 9 October 2023 and received file-stamped by the Clerk of Court on the 12 October 2023 and was due an Answer on or before 19 December 2023, 60 days from 20 October 2023 when the \$ 1691 Complaint was served on Respondent LISC via USPS as reflected in Receipt Number 840-55300219-5-4255545-2 with a ID USPS Clerk Number 85 on 20 October 2023 at 6:37 CST. LISC was served the Complaint along with the Waiver-of-Service to be delivered on or thereabout 23 October 2023 to the address noted below from the USPS facility located at 345 West Saint Paul Avenue, Milwaukee WI 53203. Such is attached as Exhibit 1.1. As of 19 DECEMBER 2023 LISC has refused to respond to 23-CV-1357, thus by deception also refusing to acknowledge the jurisdiction of the Court in its efforts to use as a human shield LISCs reasoning or LISCs rationale for not responding to 23-CV-1357. Pablito Vega prays the Court issues an Order of Default Judgment against Respondent LISC in the amount sought within the \$ 1691 Complaint of \$800,000.

Pablito Vega filed with the Court two Waiver-of-Service Forms. One Waiver-of-Service was returned by MEDC acknowledged received on 1 NOV 2023. The other Waiver-of-Service Form was a personal copy held in reserve by Pablito Vega as proof that such Form was the actual Form served to LISC on 20 October 2023 minus a WET signature and WET date but not acknowledged by LISC on any day thereafter on the version that included the WET signature and WET date. Both MEDC and LISC were served on the same day, 20 OCT 2023. The only difference is that MEDC acknowledged receipt on 1 NOV 2023, whereas LISC is being deceptive and corrupt by refusing to acknowledge receipt of the \$ 1691 Complaint and Waiver-of-Service any time after 20 OCT 2023. An answer was due 60 days from 20 October 2023 which fell on 19 December 2023 that has not been met by the failure of Respondent LISC to provide that Answer. The Court should be advised that LISC refused to file anything, and that included an Answer or Appearance, acknowledge the Waiver-of-Service by returning such to Petitioner Vega with a date of receipt or the Consent for Magistrate Judge within 21 days as of being served the \$ 1691 Complaint on 20 October 2023 by the Petitioner Vega.

Respondent MEDC was served in the same manner and has acknowledged the Waiver-of-Service by returning such to Petitioner Vega with a date of receipt of 1 NOVEMBER 2023. LISC refused to acknowledge being served on 20 OCT 2023. LISC has not filed an Appearance & Consent for Magistrate Judge, unlike MEDC who has provided an Answer prior to 19 December 2023, doing so on 15 DECEMBER 2023. But please remember that MEDC can only speak for MEDC and not speak for LISC who has refused to acknowledge the jurisdiction of the Court. LISC can't use MEDCs Counsel to speak for LISC. LISC has to speak for itself, which it has not. LISC can't use as a human shield its reasoning or its rationale for not responding. LISC has simply elected to refuse to acknowledge being served the Complaint and Waiver-of-Service on 20 OCT 2023 by not responding with an Answer prior to 19 DEC 2023. LISC on 21 DEC 2023 signed at 1116 CST receiving the Motion For Default Judgement at the address below. Such is attached as Exhibit 1.2. Was LISC required to do the same on 23 OCT 2023 or thereabouts in acknowledging receipt of the \$ 1691 Complaint and Waiver-of-Service? No! There is no legal requirement in Wisconsin that LISC was legally required to be served by Pablito Vega via Certified Mail with the \$ 1691 Complaint and Waiver-of-Service on 20 OCT 2023 in order for LISC to not deny that LISC was not served via USPS on 20 OCT 2023 the \$ 1691 Complaint and Waiver-of-Service by Pablito Vega. LISC was properly and legally served on 20 OCT 2023 via USPS by Pablito Vega. LISC has obviously not acted in good faith. LISC is simply not being truthful and indeed being truly deceptive and corrupt by not acknowledging to the Court or anyone else being in fact served with the \$ 1691 Complaint and Waiver-of-Service on 20 OCT 2023, in order to not be held liable for the sum in question, or for the corrupt conduct of its staff in Fall 2022, an obvious act of bad faith that the Court should use against LISC. Therefore, since Respondent LISC has purposefully refused to provide an Answer to 23 CV 1357, Vega v. LISC & MEDC prior to 19 December 2023, 60 days from 20 October 2023 the Petitioner Vega ask the Court to issue an ORDER of Default Judgment against Respondent LISC in the amount of \$800,000 for failure to respond to the \$ 1691 Complaint.

Pablito Vega
Quantitative Analyst
Vega Global Advisors
1314 South First Street
Lobby Suite
Milwaukee WI 53204
1-609-874-9129 Phone
1-248-748-2676 Fax
Vegas_P@outlook.com

Pablito Vega 29 DEC 2023
PABLITO VEGA DATE

The Court should note the attached Subpoena directed at the Office of the Executive Director of LISC currently filled by one Theodore Lipscomb Sr. advising such to release to the Court the Large Yellow Envelope post-marked 20 OCT 2023 dated stamped received on or after 23 OCT 2023 that was mailed to LISC Office of Legal Counsel at 234 Florida Street, Suite 204, Milwaukee WI 53204 from 1314 South First Street, Milwaukee WI 53204 by Pablito Vega that contained the Waiver-of-Service and \$1691 Complaint.

Sob juramento de lei, Pablito Vega, que sos es uno de los Europello más marravillozzo de tododeis de los Europellos y jura que a sua declaração está correta e não diz mais nada sobre a seguinte pergunta de oz Santos Europellos en vosotros cielo gloriozzo de oz Europello mas pode rozzo des di Saa-Maria y Judia y les pedodeis a la Europella toda pode rozza en vosotros cielo glorizzo Santa Cecilia de los Santos proteccioneis contrais el enfermo enemigo de la santa paz y tranquilidad. Please take notice that on 29 DECEMBER 2023 Pablito Vega deposited into the USPS the attached MOTION to be filed with the Clerk of the US District Court at Wisconsin Eastern District Milwaukee Division. Pablito Vega certifies under the penalty of perjury and criminal liability that a copy of this Notice of Filing along with the MOTION will be served upon the parties listed below.

NOTICE OF FILING & PROOF OF SERVICE

Community Development Financial Institution
Office of Legal Counsel
LISC Milwaukee Office
234 West Florida Street
Suite 204
Milwaukee, WI 53204
Phone: 414.273.1815
Fax: 414.273.2036

PABLITO VEGA
Vega Global Advisors
MID-WEST REGION OFFICE
1314 South First Street
LOBBY SUITE
Milwaukee, WI 53204
1-609-874-9129 PHONE
1-248-748-2576 FAX



December 22, 2023

Dear PABLITO VEGA:

The following is in response to your request for proof of delivery on your item with the tracking number:
7022 1670 0003 1345 1200.

Item Details

Status:	Delivered to Agent for Final Delivery
Status Date / Time:	December 21, 2023, 11:16 am
Location:	MILWAUKEE, WI 53204
Postal Product:	First-Class Mail®
Extra Services:	Certified Mail™

Shipment Details

Weight:	1.0oz
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Recipient Signature

Signature of Recipient:
(Authorized Agent)

S. Maciej
S. Maciej

Address of Recipient:

234 W FLORIDA ST STE 204,
MILWAUKEE, WI 53204

Note: Scanned image may reflect a different destination address due to Intended Recipient's delivery instructions on file.

Thank you for selecting the United States Postal Service® for your mailing needs. If you require additional assistance, please contact your local Post Office™ or a Postal representative at 1-800-222-1811.

Sincerely,
United States Postal Service®
475 L'Enfant Plaza SW
Washington, D.C. 20260-0004

UNITED STATES DISTRICT COURT

for the

Eastern District of Wisconsin

PABLITO VEGA

Plaintiff

v.
LISC

Defendant

Civil Action No. 23-CV-1357

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To:

THEODORE LIPSCOMB, SR.
EXECUTIVE DIRECTOR, LISC MILWAUKEE OFFICE

(Name of person to whom this subpoena is directed)

☒ **Production:** YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material. Large Yellow Envelope Posted Marked 20 OCT 2023 with LISC date stamp recieved on face of envelope on any day of 23, 24, 25, 26, or 27 OCT 2023 mailed from Pablito Vega, 1314 South First Street, Milwaukee, WI 53204 to Office of Legal Counsel, LISC Milwaukee Office, 234 West Florida Street, Suite 204, Milwaukee WI 53204. Along with any other materials within such large yellow envelope also date stamp recieved by LISC

Place: US District Court House Chief Judge Pamela Pepper, Court Room 222 517 East Wisconsin Avenue Milwaukee WI 53202	Date and Time: 01/05/2024 12:00 am
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☐ **Inspection of Premises:** YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place: N-A	Date and Time: N-A
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The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(e), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(c) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: _____
GINA M. COLLETTI
CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing *(name of party)* PABLITO VEGA 1314 SOUTH FIRST STREET, MILWAUKEE WI 53204, who issues or requests this subpoena, are: PABLITO VEGA, 1314 SOUTH FIRST STREET, MILWAUKEE WI 53204, Vegas_P@outlook.com, 609-874-9129

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

PAGE 1 OF 1



MILWAUKEE
345 W SAINT PAUL AVE
MILWAUKEE, WI 53203-3099
(800)275-8777

10/20/2023 06:37 PM

Product	Qty	Unit Price	Price
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First-Class Mail® Large Envelope	1		\$1.59
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Milwaukee, WI 53202
Weight: 0 lb 1.90 oz
Estimated Delivery Date
Mon 10/23/2023

First-Class Mail® Large Envelope	1		\$1.59
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Milwaukee, WI 53204
Weight: 0 lb 1.90 oz
Estimated Delivery Date
Mon 10/23/2023

Grand Total:			\$3.18
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Cash			\$20.00
Change			-\$16.82

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or call 1-800-410-7420.

UFN: 560051-0204
Receipt #: 840-55300219-5-4255545-2
Clerk: 85

MA